

From: Charles Jennings [<mailto:vigilguy@gmail.com>]

Sent: Wednesday, January 03, 2018 7:57 AM

To: FS-objections-chief <objections-chief@fs.fed.us>

Cc: Charles Jennings <vigilguy@gmail.com>

Subject: Notice of Objection: Use of Sheep, Goats and Pack Goats EIS / Shoshone National Forest

Greetings -

While I agree with the proposed separation (for now) of packgoats from core-native bighorn sheep habitat until science shows definitely otherwise, I have concerns about faulty claims made by the Forest Service that are scientifically unfounded and are biased towards packgoats

In this email, it contains objections that need to be addressed. Two pdf files are attached as references.

First of all, the document title, "Risk Analysis of Disease Transmission", which I will address initially, should be renamed as follows: "Disease Transmission" indicates a bias, and should be changed in the title and throughout the document as probability of "pathogen transmission" or bacteria transmission". "Disease Transmission implies an absolute transmission of pneumonia or similar disease, and the concerns addressed are actually referring to a probability or possibility of transmission of *M. ovipneumoniae*.

On page 10 of the Risk Analysis, Tom Besser's 2017 commingling study is cited, and mentions that healthy bighorn sheep developed pneumonia after being commingled with *M. ovipneumoniae* test -positive domestic goats. I strongly object to this claim, because it is not true, and cannot be proven to be true. In the Histopathology Report of these three healthy bighorn sheep used in Test #3 (Case #7604, attached), there is absolutely NO mention of pneumonia at all in the Histologic Diagnosis. If the Forest Service is going to make the claim that domestic goats cause pneumonia in bighorn sheep, please provide the supporting histopathology reports to support your claim. No bighorn sheep died naturally during any of Tom Besser's experiments. They were killed by Tom Besser's staff after 100 days of commingling, and they were recovering during that time frame.

I would like to think that the Forest Service wants the absolute unbiased truth (which is provided from the accurate Histopathology Reports) when developing Risk Analysis documents, instead of a biased and scientifically un-supported opinion.

Also on page 10 of the Risk Analysis, it states, "...and there have been no documented cases of pack goats transmitting disease to bighorn sheep". If this is the case, then WHY are you banning packgoats from core native bighorn sheep habitat? The Forest Service has zero documented evidence to support the ban. The 2003 Rudolph study is referenced, and it clearly states within the publication, as pointed out by Dr. Maggie Highland, that the bighorn sheep and the feral goat had completely different strains of bacteria, and it clearly shows that the goat was not the culprit in the massive Hells Canyon die-off, even though the Rudolph publication has been incorrectly used for years as a reason to ban goats from the Forest.

On page 11 of the Risk Analysis, the Silver Bell bighorn sheep herd was referenced. This inclusion is arbitrary and capricious, and the Forest Service could be accused of targeting packgoats in an unfair manner. Other animals such as cattle can carry *Mannheimia hemolytica*, *Bibersteinia trehalosi*, and *Pasturella multocida*. They can also carry the bacteria that causes the highly contagious Johne's disease (*Mycobacterium*) and the viral blue tongue virus. If this is the case, then why aren't cattle being included in the Risk Analysis?

Finally, if the Forest Service imposes spacial and temporal separation (on paper), how does the Forest Service intend to enforce this separation? The Shoshone National Forest is a huge Forest with severely limited personnel to enforce a ban or spacial separation. While I would like to think that the vast majority of goat packers (me included) will comply with the Forest's decision of banning packgoats from core-native bighorn sheep habitat, in reality it is foolhardy to assume that a Forest Plan revision will keep out the "rogue" individuals that refuse to comply. The south side of Chicago has some of the strictest gun laws in the country, but that hasn't stopped the incredibly high murder rates in that city. My point is this - Implement Best Management Practices in combination with the Permits. While I do feel comfortable with keeping packgoats out of bighorn sheep habitat (for now), it seems like an un-enforcible requirement that you are imposing on recreational goat packers.

Charles Jennings, Former NAPgA President
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